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AO 91 (Rev. 11/11) Criminal Complaint

United States of America

Antoine Reese Thomas

Special Agent: John Franklin

Telephone: (313) 202-3400

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

Case: 2:21-mj-30364

Assigned To: Unassigned Case No. Assign. Date: 7/23/2021

Description: U.S. V. THOMAS

(CMP)(MEV)

		C	RIMINAL COMPLAI	NT		
I, the com	plainant in this cas	se, state that	the following is true to	the best of my knowled	ge and belief.	
On or about the date(s) ofJuly 17, Ju		ly 19, and July 20, 2021	in the county of	Wayne	in the	
Eastern	District of	Michigan	, the defendant(s)	violated:		
Code Section			Offense Description			
(Three Counts) 18 U.S.C. § 875(c)			Transmitting in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injurt the person of another			
This crimi see attached affidavi	nal complaint is b it.	ased on thes	e facts:			
Continued on the attached sheet.			Complainant's	signature		
				John Franklin, Specia	l Agent (ATF)	
Sworn to before me and signed in my presence and/or by reliable electronic means.		Printed name and title				
Date:		Judge's signature				
City and state: Detroit, Michigan			Hon. K	Hon. Kimberly G. Altman, United States Magistrate Judge Printed name and title		

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, John Franklin, Special Agent, being sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

- 1. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.
- 2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and have been since 2003. I have conducted numerous investigations involving violations of firearms, arson and explosive laws. I am an "investigative or law enforcement officer of the United States" within the meaning of 18 U.S.C. § 2510(7). As an ATF Special Agent, I am also trained as a Special Agent Certified Explosive Specialist/Bomb Technician (SACES/BT). As such, I have participated in numerous courses including, the ATF Explosive Specialist Basic Training Course, the ATF Homemade Explosives course, the NAVSCOLEOD Basic Improvised Explosive Device Training Course, and the U.S. Public Safety Bomb Technician Course at the FBI'S Hazardous Devices School. I have been

involved in numerous investigations of federal arson and explosive laws resulting in the conviction of defendants for violations of federal arson and explosive laws.

3. I am currently investigating Antoine Reese THOMAS, DOB: xx/x/1992, for a violation of federal law, to wit, Title 18, United States Code, Section 875(c), transmitting in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

PROBABLE CAUSE

4. On July 17, 2021, Highland Park Police Department (HPPD) was contacted by Faurecia Automotive Seating advising that they had received a bomb threat to their manufacturing facility located at 13000 Oakland Blvd., Highland Park, MI, through the service that provides their temporary employees, Adecco Staffing. The threat was received via text message from phone number (313) 880-xxxx by Adecco staffing supervisor C.W. The threat was texted to (313) 597-xxxx, which is C.W.'s work phone and is only utilized by those hired by Adecco. The texted threat stated:

"I being have suicide thoughts im at the end of my rope and csnt take nomore but before I make my move im going to take hundreds of people with me so im going to blow up fercuria plant I don't know if I want to do it tomorrow or Sunday but its going to happen don't nobody understand what in going through so im going to end it this way sorry but you being warned." 5. HPPD Detective (Det.) Mitch Heaney determined that the number that sent the threat, (313) 880-xxxx, belonged to a third-party texting application, "TextNow". An exigent disclosure request was sent to "TextNow" who provided the following information for the account utilizing (313) 880-xxxx:

Username: projectcity82

Email: projectcity82@gmail.com

Registration IP: 172.58.121.78 (T-Mobile)

Date of Ownership: 7/17/21 04:04:10 UTC – 7/18/21 03:59:59

UTC

IP Addresses: 69.137.218.254 was listed as being assigned to the device using this number on 7/17/21 from 04:04:10 UTC - 04:54:54 UTC. This is within the time frame that the text message threat was received by C.W.

6. The associated IP address, 69.137.218.254, was determined to belong to Comcast. An exigent request was sent to a Triage Security Analyst, who provided the following Comcast subscriber information for this IP address:

Name: I.W.

Address: 5xxx Guilford, Detroit, MI 48234

Phone: (248) 986-xxxx

7. On July 19, 2021, at or about 2:18 p.m. EDT (6:18 p.m. UTC), C.W. received a second bomb threat via text message from phone number (248) 970-xxxx. The threat once again was received by C.W.'s work phone and stated:

"Well well I hope your employees like the sounds [three emojis of explosions] because today its going to happen you will never know the time but it will happen i had to plan it out but im ready to die I wonder is everybody in faurecia is ready I can nolonget fight this suicidal thoughts so today im going to end it all and why not go out with a bang so we will be taking the whole building down today!"

8. HPPD Det. Heaney determined that phone number (248) 970-xxxx also belonged to "TextNow". Once again, an exigent disclosure request was sent based on the nature of the message. In response, "TextNow" provided the following information:

Username: twan9292

Email: twan9292@gmail.com Registration IP: 69.137.218.254

Date of phone ownership: $7/17/21 \ 04:55:19 \ UTC - 7/19/21$

10:21:32 UTC

IP addresses: 172.56.10.30 is the IP address assigned during

the time frame of the threat and belongs to T-Mobile.

- 9. The associated IP address, 69.137.218.254, was the same as the IP address for the first threat, belonging to the Comcast account at 5xxx Guilford, Detroit, MI.
- 10. On July 19, 2021, Det. Heaney obtained a State search warrant from 30th District Court Judge Officer-Hill for the residence at 5xxx Guilford, Detroit, MI.
- 11. On July 20, 2021, while surveillance was being conducted on 5xxx Guilford, HPPD officers observed I.W. leave the location in a vehicle. I.W. was subsequently temporarily detained for further investigation. I.W. was advised of her *Miranda* rights, which she waived. I.W. advised the Detectives that her child's father, Antoine THOMAS, had been staying at the 5xxx Guilford address with her. I.W. further advised that THOMAS worked for Faurecia, that she had knowledge of THOMAS using the "TextNow" application in the past, that THOMAS was at 5xxx

Guilford address on the dates of the threats, and that THOMAS was currently alone at the 5xxx Guilford address.

- 12. Shortly thereafter, officers observed THOMAS exit the 5xxx Guilford address. THOMAS was arrested and later transported to Highland Park Police Department. Officers conducted a search incident to arrest of THOMAS at which time a Samsung Galaxy cellular phone was recovered from THOMAS. Officers then served the aforementioned search warrant at 5xxx Guilford, Detroit, MI, and recovered the following property:
 - LG Tmobile cellular phone, from top of fire place mantle.
 - Cellular phone in black case, from upstairs bedroom bed
 - Xfinity Router, S/N 7AA2WZ6BCB01392, from living room
 - Xfinity Router, S/N 286382328, from living room
- 13. On July 20, 2021, prior to the arrest of THOMAS, and while THOMAS was alone in the residence at 5xxx Guilford, HPPD officers were advised that a third bomb threat had been texted to C.W. at approximately 2:34 p.m. EDT (6:34 p.m. UTC) from phone number (517) 684-xxxx. The threat stated the following:

"Okay so you guys are running my plans no worries i will follow through and carry out with my plans I will blow up the building however if you continue to intervene i will just do a mass shooting this is revenge for the two guys that work in you factory bullied me now im going to end it all I can get in the building with ease hope you guys ready this is about to be a sad day Im done being patient im coming full force!" 14. HPPD Det. Heaney determined that (517) 684-xxxx also belonged to "TextNow". "TextNow" provided the following information:

Username: twan9292

Email: twan9292@gmail.com Registration IP: 69.137.218.254

Date of phone ownership: 7/20/21 18:29:10 UTC - 7/22/21

03:59:59 UTC

IP Address: 172.58.121.17 was the IP address assigned during the time frame the text was sent. This IP address belongs to T-Mobile.

1 1/100110.

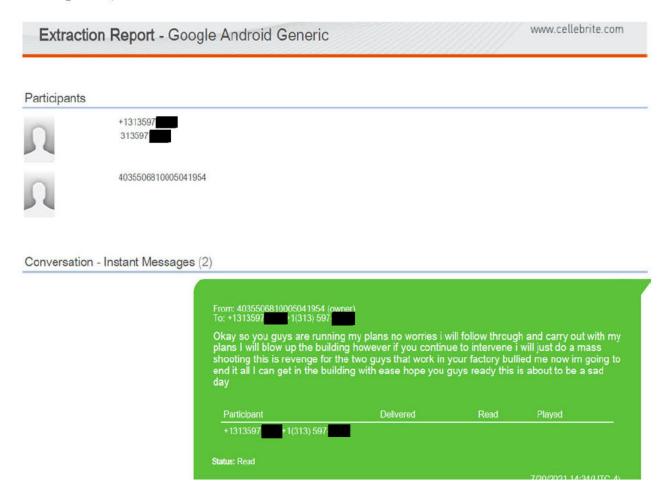
15. The associated IP address, 69.137.218.254, was the same as the IP address used for the first two threats, belonging to the Comcast account at 5xxx Guilford, Detroit, MI.

16. On July 21, 2021, during the course of a recorded in-custody interview, THOMAS provided HPPD Det. James McMahon and ATF SACES/BT Franklin with verbal and written consent to search his cellular phone, a Samsung Galaxy, model A12, S/N R58R343B83A, IMEI 354150871054461, cellular number (313) 765-xxxx.

17. On July 21, 2021, Det. Heaney also obtained a state search warrant for the aforementioned Samsung Galaxy cellular phone, IMEI 354150871054461 previously seized from THOMAS. The cellular phone and copy of the warrant were then transported to Detroit Police Department (DPD) Det. Sara Markel for forensic analysis.

- 18. On July 22, 2021, SACES/BT Franklin met with DPD Det. Markel and reviewed the forensic extraction report for THOMAS'S Samsung Galaxy, model The extraction report identified multiple user A12, IMEI 354150871054461. accounts associated with the cellular phone, including projectcity82@gmail.com and twan9292@gmail.com. One of the user accounts recovered from the cellular phone "TextNow" account with the associated email of was twan9292@gmail.com, which is the same as the "TextNow" account used to transmit the July 19, 2021 and July 20, 2021, bomb threat messages to Faurecia. As noted previously, the July 17, 2021, bomb threat was conveyed from a "TextNow" account utilizing the email account of projectcity82@gmail.com, an account that is also associated with THOMAS'S cellular phone. Another user account located on the cellular phone was identified as an Uber account with an account name of "antoine thomas" and an email of projectcity82@gmail.com.
- 19. The review of the extraction also revealed a number of text message utilizing a third-party text application between +1313597xxxx, which is the phone number of C.W.'s work phone, and username "twanthomas958431". These text messages occurred between 7/9/2021 and 7/20/2021, and focused on work related subjects.

20. The review of extraction revealed the following instant message which was sent from the "TextNow" application on the phone to +1313597xxxx (C.W.'s work phone):



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CONCLUSION

Based on the foregoing, I have probable cause to believe that, Antoine 21. Reese THOMAS, did knowingly transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, in violation of Title 18, United States Code, Section 875(c).

Respectfully submitted,

John Franklin, Special Agent

Bureau of Alcohol, Tobacco, Firearms

and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. Kimberly G. Altman

United States Magistrate Judge

Dated: July 23, 2021